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Attorneys for Defendant  
 LIFE INSURANCE COMPANY OF NORTH AMERICA

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

ANN EDWARDS,  
 Plaintiff,

v.

LIFE INSURANCE COMPANY OF NORTH  
 AMERICA,  
 Defendant.

) Case No.: C09-01642 VRW  
 )  
 ) Chief Judge Vaughn R. Walker  
 )  
 ) **JOINT STIPULATION TO CONTINUE**  
 ) **SCHEDULING CONFERENCE AND**  
 ) **[PROPOSED] ORDER**  
 )  
 ) Scheduling Conference:  
 ) Date: September 3, 2009  
 ) Time: 3:30 p.m.  
 ) Place: Courtroom 9  
 )  
 ) Action filed: April 15, 2009  
 )  
 )

**TO THE HONORABLE JUDGE OF THE COURT:**

Plaintiff Ann Edwards and defendant Life Insurance Company of North America (hereinafter "LINA"), by and through their respective counsel of record, hereby stipulate and respectfully request that the Scheduling Conference currently scheduled for September 3, 2009 in this matter be continued for approximately 60 days. The parties have reached a settlement of this matter and are in the process of finalizing a release memorializing the terms of the parties' settlement.

In light of the parties' settlement, good cause exists to grant the parties' request for a

1 continuance based on the following grounds:

2 1. The above-entitled action was filed on April 15, 2009 in this Court;

3 2. On or about April 22, 2009, LINA was served with the summons and complaint  
4 filed in this action;

5 2. On May 13, 2009, counsel for LINA filed a stipulation for continuance of time to  
6 May 26, 2009 to file a responsive pleading;

7 3. On May 26, 2009, counsel for LINA filed a second stipulation for continuance of  
8 time to June 9, 2009 to file a responsive pleading;

9 4. On June 9, 2009, LINA filed and served an answer to plaintiff's complaint;

10 5. On June 15, 2009, the Court rescheduled the date of the initial case management  
11 conference to September 3, 2009 at 3:30 p.m.

12 6. On or about July 29, 2009, the parties orally reached a settlement of all claims in  
13 this action. The parties are currently in the process of finalizing a release, which memorializes the  
14 terms of the settlement.

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For all the stated reasons above, IT IS HEREBY STIPULATED AND AGREED by and between the parties and their respective counsel of record, and it is respectfully requested that the Court permit and enter an Order to continue the Initial Case Management Conference currently set for September 3, 2009 for an additional 60 days. Case management conference continued to 11/5/2009 at 3:30 PM.

Date: August 26, 2009

WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP

By: /s/ Shivani Nanda  
SEAN P. NALTY  
SHIVANI NANDA  
Attorneys for Defendant  
LIFE INSURANCE COMPANY OF NORTH  
AMERICA

Date: August 26, 2009

LAW OFFICES OF P. RANDALL NOAH

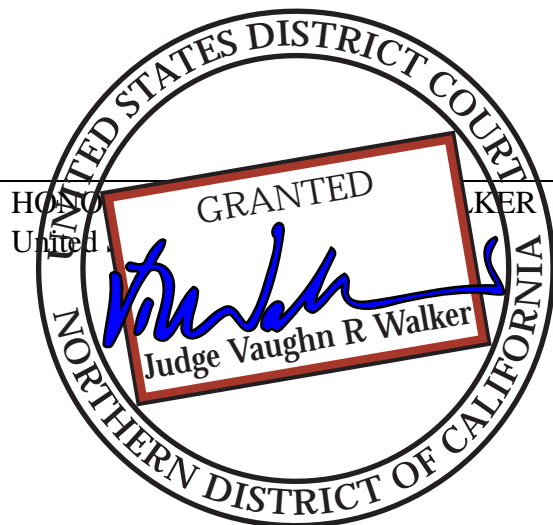
By: /s/ Randall Noah  
RANDALL NOAH  
Attorneys for Plaintiff  
ANN EDWARDS

**ORDER**

**IT IS SO ORDERED.**

Date: 8/27/2009

By: \_\_\_\_\_



**CERTIFICATE OF SERVICE**

I hereby certify that on August 26, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 26, 2009.

/s/ Shivani Nanda

SHIVANI NANDA

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